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States Government

Department of Energy

Rocky Flats Field Office

memorandum

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EG&G
ROCKY FLATS PLANT
CORRESPONDENCE ROOM

ER KM 08074

Interim Guidance on Operable Units 5 and 6 Risk Assessment Calculations

Sue G Stuger, Program Director
Environmental Restoration Project
EG&G Rocky Flats, Inc

ADMIN RECORD

The purpose of this memorandum is to provide interim guidance on the inclusion of arsenic, barium, and nickel in the risk calculations for Operable Unit (OU) No 5 and OU 6. Recent communications from the regulatory agencies have indicated that these chemicals should be included in the risk calculations even though documents submitted by the Department of Energy (DOE) regarding OU 5 and OU 6 indicated these are not chemicals of concern. The DOE is presently in a dispute resolution over the inclusion of arsenic as a chemical of concern for OU 3. Based on the technical arguments previously presented to the regulatory agencies, and in light of the OU 3 dispute, it is the DOE's position that arsenic should not be included in risk calculations for OU 5 or OU 6 until a decision has been reached on OU 3. All other work on OU 5 and OU 6 risk assessment should continue and not be impacted by this memorandum.

The DOE agrees that barium should be included in the risk calculation. Per discussion with the EPA, nickel should be included in the OU 5 risk calculation as a non-carcinogen only.

As discussed with your staff, please provide a comprehensive and exhaustive technical argument supporting the exclusion of arsenic as a Chemical of Concern in OU 5 and 6.

If you have any questions, please call Kurt Muenchow at extension 2184.



Jessie Roberson
Assistant Manager for
Environmental Restoration

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